## Case 2:25-cr-00017-DJC Document 18 Filed 05/21/25 Page 1 of 3

1 2	MICHELE BECKWITH Acting United States Attorney CHARLES CAMPBELL Assistant United States Attorney 501 I Street, Suite 10-100 Sacramento, CA 95814 Telephone: (916) 554-2700	
3		
4		
5	Facsimile: (916) 554-2900	
6	Attorneys for Plaintiff	
7	United States of America	
8	IN THE IINITED ST	LATES DISTRICT COLIDT
9	IN THE UNITED STATES DISTRICT COURT	
10	EASTERN DISTRICT OF CALIFORNIA	
11	UNITED STATES OF AMERICA,	CASE NO. 2:25-CR-00017-DJC
12	Plaintiff,	STIPULATION TO CONTINUANCE OF STATUS
13	v.	CONFERENCE, EXCLUDABLE TIME PERIODS UNDER SPEEDY TRIAL ACT; FINDINGS AND ORDER.
14	ARMOND BASS,	
15	Defendant.	DATE: May 29, 2025 TIME: 9:00 a.m. COURT: Hon. DANIEL J. CALABRETTA
16		
17	STIPULATION	
18	Plaintiff United States of America, by and through its counsel of record, and defendant, by and	
19	through defendant's counsel of record, hereby stipulate as follows:	
20	1. By previous order, this matter was set for a status conference on May 29, 2025.	
21	2. By this stipulation, the United States now moves to continue the status conference until	
22	June 26, 2025, at 9:00 a.m., and to exclude time between May 29, 2025, and June 26, 2025, under Local	
23	Code T4.	
24	3. The parties agree and stipulate, ar	nd request that the Court find the following:
25	a) The government has represented that the discovery associated with this case	
26	includes investigative reports and memorandums in documentary form totaling over six hundred	
27	pages, several hours of video and audio footage, as well as physical evidence. All of this	
28	discovery has been either produced directly to counsel and/or made available for inspection and	

copying.

- b) Counsel for defendant desires additional time to consult with her client, review the provided discovery materials, discuss potential resolutions with her client, and otherwise prepare for trial.
  - c) Counsel for defendant does not object to the continuance.
- d) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.
- e) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of May 29, 2025 to June 26, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C.§ 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at the government's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.
- 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

19

15

16

17

18

20

21

22

23

24

25

2627

28

Dated: May 20, 2025

Dated: May 20, 2025

/s/ NOA OREN

NOA OREN

Counsel for Defendant ARMOND BASS

MICHELE BECKWITH

Acting United States Attorney

/s/ CHARLES CAMPBELL

Assistant United States Attorney

CHARLES CAMPBELL

2

**ORDER** 

IT IS SO FOUND AND ORDERED this 21st day of May, 2025.

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA UNITED STATES DISTRICT JUDGE